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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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|-----------------|---|-------------------------|
| Kenneth W. Hall |) | |
| |) | |
| Complainant, |) | |
| |) | |
| V. |) | Case No. 06-1353-TP-SLS |
| |) | also |
| |) | Case No. 06-326-TP-CSS |
| AT&T Ohio |) | |
| |) | |
| |) | |
| Respondent |) | |

Kenneth W. Hall
5660 Southwyck Blvd. Suite 100
Toledo, OH 43614

P.O. Box 351778
Toledo, OH 43635-1778

AT&T Account Number: 419 866 9120 7932

KENNETH W. HALL'S COMPLAINT, ARGUMENTS AND OBJECTIVES

COMPLAINT

AT&T in Case No. 06-1353-TP-SLS has requested an increase in the Late Payment Fees that would apply to small business customers. I am objecting to this increase on the basis that the current Late Payment Fee is already excessive and particularly punishing to very Small businesses. An increase in the fee simply compounds the problem. I had previously submitted a complaint Case No. 06-326-TP-CSS that has not been resolved. In this Complaint, I attempted to illustrate the punishing nature of the current Late Payment Fee as it relates to small business customers and encourage the PUCO to review the existing Late Payment Fee and roll the fee back to a flat 1 ½% without the \$10.00 minimum Fee

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ARGUMENTS

1. To illustrate, I am using my AT&T billing date for December 25, 2006 in which my Bill was \$46.44 for all plans services and taxes. If I were one day late, the company Billing system would bill my account automatically, the greater of \$10.00 or 1 ½ %. In my case, the penalty would be \$10.00. This represents a monthly interest rate of 21.53% or 258.36% annually. When you contrast this to a 30 day "Pay Day Loan", the rate is 75.86% higher than a pay day loan.
2. The new requested rate of \$11.00 represents a monthly interest rate of 23.69% or 284.28% annually. When you contrast this to a 30 day "Pay Day Loan", the rate is 101.78% higher than a "Pay Day Loan".
3. I use the "Pay Day Loan", as an example because these loans have generated a great deal of bad publicity in a financial services system that is virtually deregulated. Fortunately, the PUCO does regulate the various utilities and can review and request information from the utility to determine the need for their various requests. I contended in my original complaint that the company was using the fee as an additional profit center.
4. I made additional comments in Case No. 06-326-TP-CSS that recently, Toledo Edison included a late payment fee of 1 ½ %. No minimum fee was charged. Is AT& T more privileged than Toledo Edison? Is AT&T taking more risk? Electric service cannot be terminated as easily as phone service.
5. I have contacted the company to determine the extent of risk the company takes when

a customer is late with payments. I was told that if a bill was not paid by the due date, service would be cancelled by the next billing date if the balance was not paid. If the service was cancelled, the customer would be subjected to new fees to re-start the service. AT&T is taking a very short risk and charging late fees that are similar to financial service interest rates for people with the worst credit histories and significantly more risk. I must use the interest rate comparison because that is the only way a business can analyze the impact of these penalties. A T& T is a regulated utility not a deregulated financial services company. Late fees should not be a profit center in either case and especially utilities.

6. The current late payment fee was never challenged and was no doubt put into place without anyone reviewing the records to determine the actual need for the minimum fee.

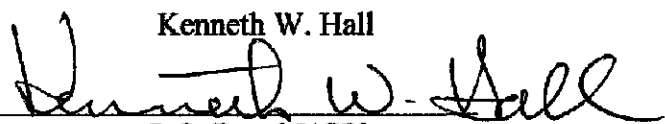
OBJECTIVES

1. I request that the PUCO obtain from AT&T information about the revenue and costs generated by the Late Payment Fees to determine the need for the requested increase.
2. During this information gathering process, I request that the PUCO review the need for the current \$10.00 minimum Late Payment Fee.
3. I request that the PUCO rollback the Late Payment Fee to the original 1 ½% without any minimum amount.

Respectfully Submitted

Kenneth W. Hall

by

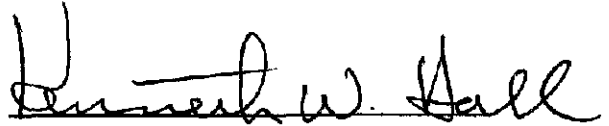


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CERTIFICATE OF SERVICE

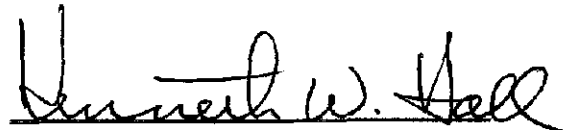
With regard to Case No. 06-1353-TP-SLF, I hereby certify that a copy of the forgoing
has been served on the following party by depositing it in the U.S. Mail, postage prepaid,
on this 12th day of January, 2007.

Robert J. Wentz, Regulatory Contact Person
AT&T Ohio
150 E. Gay Street
Columbus, OH 43215

A handwritten signature in black ink, reading "Kenneth W. Hall". The signature is written in a cursive style with a large initial "K".

With regard to Case No. 06-326-TP-CSS, I hereby certify that a copy of the forgoing has
been served on the following party by depositing it in the US Mail, postage prepaid,
on this 12th day of January, 2007

Jon F. Kelly, Its Attorney
AT&T Ohio
150 E. Gay Street, Room 4-A
Columbus, OH 43215

A handwritten signature in black ink, reading "Kenneth W. Hall". The signature is written in a cursive style with a large initial "K".